



MONTANA
TELECOMMUNICATIONS
ASSOCIATION



May 6, 2011

Marlene Dortch, Secretary
Federal Communications Commission
334 12th Street, SW
Washington, D.C.

In the Matter of

Establishing Just and Reasonable Rates
for Local Exchange Carriers,
Call Blocking by Carriers

WC Docket 07-135

Developing an Unified Inter-carrier
Compensation Regime

CC Docket No. 01-92

Rules and Regulations Implementing
the Truth in Caller ID Act of 2009

WC Docket No. 11-39

Dear Ms. Dortch,

On April 28, 2011, Ms. Betty Buckley, Executive Vice President of the Washington Independent Telecommunications Association (WITA), and Geoff Feiss, General Manager of the Montana Telecommunications Association (MTA), met with Terry Cavanaugh and Margaret Dailey of the Enforcement Bureau and Lynn Engeldow of the Wireline Competition Bureau's Pricing Policy Division.

Mr. Feiss and Ms. Buckley described an increasingly prevalent problem which has developed in the last eighteen months and which appears to be caused by IXC's and wireless companies subcontracting with third parties for call termination services. The third party contractors are failing to terminate calls on rural networks in at least 35 states. In some very rural areas, ILECs estimate that more than 10% of all calls to their service areas are dropped due to "least cost routing." Results include a loss of sales to businesses, delays in medical care, and interruptions in elder care.

Mr. Feiss and Ms. Buckley requested immediate action from the Commission to issue an advisory to the industry to cease and desist from manipulating telecommunications traffic on the public switched network in such a

way that compromises the integrity of the network and the safety of telecommunications consumers. In the longer term, Mr. Feiss and Ms. Buckley recommended that the Commission take whatever enforcement action appropriate to discontinue the behavior by companies responsible for failure to terminate calls on local networks.

Respectfully submitted,

/s/

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/s/

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